

Attorneys for Plaintiff, LUIS AVILA ESPINOZA and GUADALUPE AVILA

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

LUIS AVILA ESPINOZA and GUADALUPE AVILA,)	Case No.: CV-F-05-0411 AWI LJO
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	CONTINUE DISCOVERY DATES
vs.)	
JACKIE LADD and PCM EXPRESS,)	
business form unknown, JOYCE COOK, and)	
AGNES SELLERS, dba FARMLAND)	
TRANSPORTATION, business form)	
unknown; and DOES 1 through 20, Inclusive,)	
)	
Defendants.)	

The following Stipulation is entered into between Plaintiffs, LUIS AVILA ESPINOZA and GUADALUPE AVILA and Defendants JACKIE LADD, PCM EXPRESS,; JOYCE COOK and AGNES SELLERS dba FARMLAND TRANSPORTATION. The parties to the above entitled action by and through their respective counsel of record hereby agree and stipulate as follows:

1. The Court issued an Order with the following deadlines:
 - a. Initial Expert Witness Disclosure: September 15, 2006;
 - b. Supplemental Expert Witness Disclosures: September 22, 2006;
 - c. Non-Expert Discovery Cut-off and Related Discovery Motions: September 25, 2006; and
 - d. Expert Discovery and Related Discovery Motions; October 20, 2006.

The parties are currently in settlement negotiations and have stipulated to continue the Settlement Conference to October 26, 2006. Furthermore, the deposition of Defendant, Joyce Cook will be taken on October 11, 2006. Because of the above-referenced information, the parties have agreed to continue the above cut-off dates as follows:

- a. Initial Expert Witness Disclosure: November 10, 2006;
- b. Supplemental Expert Witness Disclosures: November 17, 2006;

- c. Non-Expert Discovery Cut-off and Related Discovery Motions: November 20, 2006;
- d. Expert Discovery and Related Discovery Motions: December 15, 2006.

The parties respectfully request the Court to enter an amendment to the Scheduling Order consistent with the stipulation of the parties above.

LAURETI & SIDIROPOULOS, A.P.L.C.

Dated: _____

_____/s/ Larry Sidiropoulos

Larry J. Sidiropoulos, Esq.

Attorneys for Plaintiffs, LUIS AVILA ESPINOZA
and GUADALUPE AVILA

LIEDLE, GETTY & WILSON, LLP

Dated: _____

_____/s/ Jaye Okamoto

Jaye Okamoto, Esq.

Attorney for Defendants, Jackie Ladd and PCM
Express

WILKINS, DROLSHAGEN & CZESHINSKI LLP

Date: _____

_____/s/ John Drolshagen

John A. Drolshagen, Esq.

Attorney for Defendant Joyce Cook and Agnes
Sellers, dba Farmland Transportation

ORDER

The Court, having reviewed the Stipulation of the parties and finding good cause, hereby issue an order continuing the following discovery dates as follows:

- a. Initial Expert Witness Disclosure: November 10, 2006;
- b. Supplemental Expert Witness Disclosures: November 17, 2006;
- c. Non-Expert Discovery Cut-off and Related Discovery Motions: November 20, 2006;
- d. Expert Discovery and Related Discovery Motions: December 15, 2006.

IT IS SO ORDERED.

Dated: September 22, 2006

_____/s/ Lawrence J. O'Neill

b9ed48

UNITED STATES MAGISTRATE JUDGE